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**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**

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|----------------------------------------|-----|------------------------|
|                                        | )   |                        |
| In the Matter of                       | )   |                        |
|                                        | )   |                        |
| Commission Seeks                       | )   |                        |
| Public Comment on                      | )   | ET Docket No. 02-135   |
| Spectrum Policy Task Force             | )   |                        |
| Report                                 | )   |                        |

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**COMMENTS OF THE TDD COALITION**

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The TDD Coalition would like to compliment the Spectrum Policy Task Force on the work that they have accomplished and their findings and recommendations as presented in the report dated November 15, 2002 (ET Docket No. 02-135). The TDD Coalition is in full agreement with the urgent need to reform spectrum policy due to the rapidly increasing demand for spectrum and tremendous advances in wireless technology. We support the policy and legislative recommendations within the report and urge implementation without delay.

The TDD Coalition is an industry organization, whose members include many of the leading developers of advanced broadband wireless technologies. The TDD Coalition members are committed to developing wireless systems that result in the greatest possible spectrum, technical, and economic efficiencies for the wireless broadband industry. The systems that our members have developed, and continue to develop, will also contribute to the efficient use of spectrum by taking advantage of "stranded" unpaired blocks of spectrum.

These advanced wireless systems already use many of the technologies referred to in the report, including leading edge digital signal processing techniques such as adaptive antenna spatial processing, adaptive modulation and interference-reducing codes. TDD Coalition members will continue to develop and evolve wireless systems using advanced techniques not

yet defined.  However, many of the current policies governing spectrum limit the introduction and deployment of these advanced systems and inhibit rather than maximize the potential benefits to the public.  As stated in the report, "the time is ripe for spectrum policy reform."

One of the propositions identified in the report that the TDD Coalition considers paramount to achieving the greatest public benefit is to provide for the "maximum flexibility of spectrum use."  Spectrum users will need to be flexible in their ability to respond to market demand and take advantage of the best available technology.

The regulations should be "technology agnostic," allowing for spectrum users to select the appropriate solution for specific market conditions and be able to adapt new technologies when conditions change.  As recommended in the report, the regulations should limit technical rules to RF requirements, such as power limits and interference standards, which are necessary to protect spectrum users against harmful interference.  A good example of this is the rules proposed by the WCAI Engineering Task Force for the MMDS/ITFS band.  These proposed changes defined rules for sharing the band between both TDD and FDD technologies.  By defining interference limits at the band edge and coverage edge, users of disparate technologies can still coexist. The regulations should not place any artificial or arbitrary limitations on technology.

The TDD Coalition also would want to remind the Commission that TDD technologies can use unpaired spectrum to deliver effective communications services.  By using the same spectrum for both upstream and downstream communications, TDD allows the introduction of new innovative data services while not requiring paired frequency allocations.  In certain cases, TDD can make overall spectrum usage more efficient by utilizing spectrum that otherwise would lay fallow.

We further agree that the "command-and-control" model for assigning spectrum rights should be limited to important public interest objectives or to conform to treaty obligations. The TDD Coalition looks forward to assisting the Spectrum Policy Task Force in any manner possible.

**About the TDD Coalition**

The TDD Coalition was created to promote the broad use of TDD technology for wireless broadband products. The group will endeavor to educate the industry and policy-makers about TDD technology, and its advantages for global broadband wireless development.

The members of the TDD Coalition are a broad range of innovative companies that have implemented TDD-based systems. Although the companies may implement TDD in different ways, they all have used TDD to create products with unique advantages. Some have used TDD to use spectrum more efficiently, some have used TDD to develop lower cost products, and other have used TDD to create higher performance products. A key goal of the TDD Coalition is to promote the benefits and advantages of TDD, and to share information about how TDD can coexist with other forms of duplexing technologies.

One of the most important functions of the Coalition is its work to inform national and international regulatory bodies. By adopting technically sound, competitively neutral service rules, regulators will allow economical deployment of TDD technology for broadband wireless access. In many cases, only small considerations are needed to allow an efficient implementation of a TDD-based solution. With regulatory bodies around the world, the TDD Coalition is working to develop implementation guidelines that will allow TDD deployments and insure harmonious coexistence of TDD with other duplexing systems. As an extension of these

efforts, the Coalition works to support TDD within global, regional and national standard organizations.

The member companies of the TDD Coalition supporting this filing are:

Aperto Networks                      Clearwire Equipment
ArrayComm                            Harris Corporation
AT&T Labs                            InterDigital Communications
BeamReach Networks                   IPWireless
Broadstorm, Inc.                     LinkAir Communications
                                     Navini Networks


                                     Respectfully submitted,

                                     TDD COALITION

                                     /s/ Randall Schwartz

                                     Randall Schwartz
                                     Chairman, TDD Coalition


January 27, 2003